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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 Mt. Hawley Insurance Company,  
15  
16 Plaintiff,  
17  
18 vs.  
19 Richardson Construction Inc.,  
20 Defendant.

Case No. 2:24-cv-01001-GMN-EJY

**JOINT STIPULATION AND ORDER TO  
AMEND DISCOVERY PLAN AND  
SCHEDULING ORDER  
(FIRST REQUEST)**

**[SUBMITTED IN COMPLIANCE WITH  
LR 26-4]**

21 **JOINT STIPULATION AND ORDER TO AMEND DISCOVERY PLAN AND**  
22 **SCHEDULING ORDER (FIRST REQUEST)**

23 IT IS HEREBY STIPULATED by and between Plaintiff Mt. Hawley Insurance  
24 Company (“Mt. Hawley”) and Defendant Richardson Construction, Inc. (“Richardson”) to  
25 extend discovery deadlines by 90 days for good cause shown. This Joint Stipulation and  
26 Proposed Order is submitted pursuant to and in compliance with LR26-4 as follows:

**1. Statement specifying the Discovery Completed**

On May 29, 2024 Mt. Hawley filed its complaint for declaratory judgment. On June 24, 2024 Richardson filed their answer. The parties filed their Joint Stipulated Discovery Plan and Scheduling Order on July 30, 2024, seeking special scheduling review which was granted by the Court. On August 28, 2024 Richardson served FRCP 34 requests for production of documents and FRCP 33 interrogatories on Mt. Hawley, which Mt. Hawley responded to on October 28, 2024.

**2. A Specific Description of the Discovery that Remains to be Completed**

An extension of the deadlines would allow for a FRCP 30(b)(6) deposition of a representative(s) of Mt. Hawley and/or deposition of the insurance agent. Furthermore, the underlying case on which this Declaratory Judgment Action is based is moving toward mediation, and an extension of the discovery deadline in this case would allow the parties the opportunity to participate in the mediation and potentially resolve the issues in this case prior to filing of dispositive motions, currently set for April 25, 2025.

**3. Reasons Why Discovery is Not Completed**

Counsel for Richardson has participated in six complex trials in the last eighteen months, and just completed a month-long trial on March 21, 2025. Richardson's counsel has a trial scheduled for May 27, 2025, which is also anticipated to go a full month. As a result, it has been difficult to complete the discovery in this case prompting the current request to extend discovery dates and deadlines.

**4. Proposed Amendments to the Scheduling Order**

	<b>Current Scheduling Order</b>	<b><i>Requested</i> Amended Scheduling Order</b>
Amending Pleadings and Adding Parties	December 20, 2024	(no change)
Initial Expert Disclosures	January 24, 2025	(no change)
Rebuttal Expert Disclosures	February 24, 2025	(no change)

Discovery Closes	March 24, 2025	<i>June 23, 2025</i>
Dispositive Motions	April 25, 2025	<i>July 25, 2025</i>
Pre-Trial Order, if no Dispositive Motions	May 26, 2025	<i>August 25, 2025</i>

**IT IS SO STIPULATED AND AGREED**

THE CAVANAGH LAW FIRM, PA	PARKER, NELSON & ASSOCIATES, CHTD.
<p>By: <u><i>Marisa A. Pocci</i></u>  Rob A. Justman (<i>Admitted Pro Hac Vice</i>)  1850 North Central Avenue, Suite 1900  Phoenix, Arizona 85004  (602) 350-8180  rjustman@cavanaghlaw.com</p> <p>Marisa A. Pocci Carney  Nevada Bar No. 10720  Litchfield Cavo, LLP  3993 Howard Hughes Parkway  Suite 100  Las Vegas, Nevada 89169  (702) 949-3100  pocci@litchfieldcavo.com  Attorneys for Plaintiff, <i>Mt. Hawley Insurance Company</i></p> <p>DATED this 24th day of March, 2025</p>	<p>By: <u><i>/s/ Theodore Parker, III</i></u>  Theodore Parker, III, Esq.  Nevada Bar No. 4716  2460 Professional Court, Suite 200  Las Vegas, NV 89128  (702) 868-8000  tparker@parkernelson.com  Attorneys for Defendant, <i>Richardson Construction, Inc.</i></p> <p>DATED this 24<sup>th</sup> day of March, 2025</p>

**ORDER**

IT IS SO ORDERED.

Date: March 24, 2025

*Clayna J. Zouchak*  
UNITED STATES MAGISTRATE JUDGE